

# EXHIBIT C

IN THE UNITED STATES DISTRICT COURT  
FOR THE CENTRAL DISTRICT OF CALIFORNIA

EDGAR SOLIS, )  
                  )  
Plaintiff,      )  
                  )  
vs.               ) Case No.  
                  ) 5:23-cv-00515-HDV-JPR  
                  )  
COUNTY OF RIVERSIDE; STATE OF     )  
CALIFORNIA; SALVADOR WALTERMIRE;    )  
and DOES 1-10, inclusive,          )  
                  )  
Defendants.      )  
- - - - -

DEPOSITION OF EDGAR SOLIS  
STOCKTON, CALIFORNIA  
FRIDAY, MAY 3, 2024

REPORTED BY:  
AMY R. NEYHART  
CSR No. 12469  
Job No. 295871

Edgar Solis, 5/3/2024

1 IN THE UNITED STATES DISTRICT COURT  
2 FOR THE CENTRAL DISTRICT OF CALIFORNIA  
3  
4 EDGAR SOLIS, )  
5 Plaintiff, )  
6 vs. ) Case No.  
7 ) 5:23-cv-00515-HDV-JPR  
8 COUNTY OF RIVERSIDE; STATE OF )  
9 CALIFORNIA; SALVADOR WALTERMIRE; )  
and DOES 1-10, inclusive, )  
9 )  
Defendants. )  
10 - - - - -  
11  
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14  
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16 DEPOSITION OF EDGAR SOLIS, a witness herein,  
17 appearing remotely in Stockton, California, taken on  
18 behalf of the Defendants, beginning at 10:17 a.m. and  
19 ending at 1:30 p.m., on Friday, May 3, 2024, before  
20 Amy R. Neyhart, CSR 12469  
21  
22  
23  
24  
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1     **APPEARANCES:**

2

3     For Plaintiff:

4                 LAW OFFICE OF DALE K. GALIPO

5                 BY MARCEL F. SINCICH, ESQ.

6                 21800 Burbank Boulevard, Suite 310

7                 Woodland Hills, California 91367

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10

11     For Defendant California Highway Patrol and Michael Bell:

12                 OFFICE OF THE ATTORNEY GENERAL

13                 BY DAVID KLEHM, ESQ.

14                 600 West Broadway, Suite 1800

15                 San Diego, California 92101

16                 619.645.9733

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1 like a medical-induced coma or like a coma or what,  
2 but -- but I know that I was knocked out for a few  
3 weeks.

4 Q Okay. When you came to out of this  
5 medically-induced coma, if that's what it was, where  
6 were you?

7 A In a hospital.

8 Q Which hospital?

9 A Riverside, Moreno Valley, I believe.

10 Q Okay. Did any doctor tell you why you were in  
11 a coma?

12 A Yes, they did. They did tell me that I -- that  
13 I was in -- that I had been shot. They said, "You had  
14 been shot."

15 Q Okay. How many times, if you recall, were you  
16 shot?

17 A Altogether, I had 15 bullet wounds. Fifteen  
18 wounds from gunshots.

19 Q Okay. Do you recall where the first -- where  
20 on your body the first bullet hit you?

21 MR. SINCICH: Vague. Calls for speculation.

22 BY MR. KLEHM:

23 Q If you recall.

24 A I'm not 100 percent sure, sir.

25 Q What's your best recollection?

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1 A I want to say my back, but I'm not 100 percent  
2 sure.

3 Q Okay. Where on your back? Like --

4 A Center mass.

5 Q Center. Okay.

6 Was it your -- your lower back or mid back or  
7 upper back?

8 A Center mass.

9 Q Okay. So right in the middle of your back?

10 A Right.

11 Q Okay. Did any of the doctors tell you that the  
12 bullet near the center mass of your back is still in  
13 your body?

14 A Yes.

15 Q Okay. Did they tell you why it's still in your  
16 body?

17 A I think it'd be -- it would cause more damage  
18 to try to pull it out than to leave it where it's at.

19 Q Okay. Have any of your doctors told you what  
20 type of bullet is in the center mass of your back?

21 A When I asked, I believe they said either 9 or a  
22 40, but I'm not sure, exactly sure. I can't -- I'm not  
23 sure what I was shot with.

24 Q Okay. All right. When you say you're not sure  
25 what you were shot with, do you mean you're not sure

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1       **what you were shot with in the center mass of your back**  
2       **or anywhere?**

3           A     To the best of my knowledge -- to the best of  
4     my knowledge, when I asked what I was shot with, the  
5     response that I was given was officers carry 9s or 40s,  
6     so it could have been either or.

7       **Q     Okay. All right. So I'm -- I'm kind of -- and**  
8       **you're probably right about that. But what I'm trying**  
9       **to find out is if the doctors told you that they were**  
10      **able to determine based on X-rays or MRIs or CT scans.**

11       A     I don't even think that would be possible. But  
12     no doctor told me to the -- the exact size of the bullet  
13     that's in my shoulder, no.

14       **Q     You just said shoulder?**

15       A     Yeah, that's because it -- it hit me center  
16     mass but went in sideways, so it's lodged inside my body  
17     towards my right shoulder area.

18       **Q     Okay.**

19       A     Like it struck me right in the center of the  
20     back but went in sideways and lodged into my shoulder  
21     area.

22       **Q     Okay. All right. And this was a bullet that**  
23      **you had been shot with on March 2, 2022, correct?**

24       A     Yes.

25       **Q     Okay. Prior to that time, had you ever been**

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1     shot with a bullet before?

2       A      Never.

3       Q      Okay. All right. Are you able to recall any  
4       sequence of, okay, the first bullet, you know, struck me  
5       here and then the second bullet struck me in a different  
6       place or -- do you recall any of the sequence of being  
7       struck by bullets?

8                   MR. SINCICH: Calls for speculation.

9                   THE WITNESS: No, I'm not sure. I don't know  
10       the exact sequences of which bullet hit where first.

11      BY MR. KLEHM:

12       Q      All right. Okay. So -- and I just want to  
13       make sure I, you know, completely explore this with you.  
14                   So you don't know what bullet hit you first or  
15       what bullet hit you second or what bullet hit you third,  
16       correct?

17       A      No, I don't.

18       Q      Okay. But the doctors told you that there were  
19       15 separate bullet wounds on your body?

20       A      There's 15 scars that indicate that I was shot  
21       15 times.

22       Q      Okay. Did the doctors talk to you about  
23       whether or not some of these bullet wounds were entry or  
24       exit wounds? That is, you know, if a bullet had passed  
25       through your body entirely.

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1           A     Yeah. In my hand, one of them went through all  
2     the way and came out in my wrist. Then I believe one of  
3     the ones that struck my elbow went through. I don't  
4     know, sir. There was so many that I -- I don't  
5     remember.

6                 But the doctors, they just -- they were pretty  
7     vague about it. They -- they didn't exactly give me  
8     like a whole rundown. And if they did, I was probably  
9     going through so much that I just don't recall.

10          Q     **Okay. Well, what I'm trying to figure out is**  
11     **if any doctor had said something to you along the lines**  
12     **of, you know, "There's 15 bullet wounds, but, you know,**  
13     **some of these are an entry wound and an exit wound, so**  
14     **that's considered two wounds" --**

15          A     Oh, no.

16          Q     -- **"from one bullet."**

17          A     Yeah, I -- no. I was told that I got shot in  
18     the leg six times, once in the upper thigh, once on my  
19     left knee, twice in my hand, twice in the elbow, once in  
20     the back, and twice in the buttocks. That's 15 shots.

21          Q     **Okay. Sorry. I wasn't able to write that down**  
22     **fast enough. Can you go over that --**

23          A     It's okay. I can repeat that.

24          Q     **Okay. Thank you.**

25          A     Six in the right leg from the knee down.

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1 further questions at this time. I just wanted to  
2 clarify those couple of points.

3 Mr. Klehm, I'm not -- did we lose you or -- I  
4 don't know if I just can't -- okay. There you are.

5 MR. KLEHM: Still here, Mr. Sincich.

6 MR. SINCICH: Thanks.

7

8 FURTHER EXAMINATION

9 BY MR. KLEHM:

10 Q If you could, Mr. Solis, just for the record,  
11 since you were talking about the shoulder where the  
12 bullet is still lodged, what side is that on?

13 A It's on my right side, sir.

14 Q All right. Thank you. I don't have any --

15 A You're welcome.

16 Q -- more questions.

17 THE COURT REPORTER: Mr. Sincich, would you  
18 like a copy?

19 MR. SINCICH: I'm sure we're going to end up  
20 getting a copy, but can I get back with you to see  
21 whether or not it's -- the time frame for it? I don't  
22 know if you want to put your E-mail in the chat.

23 THE COURT REPORTER: Sure.

24 (The proceedings concluded at 1:30 p.m.)

25 \* \* \*

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1 STATE OF CALIFORNIA )

2 COUNTY OF SAN DIEGO )

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4 I, Amy R. Neyhart, a Certified Shorthand  
5 Reporter, do hereby certify:

6 That prior to being examined, the witness in  
7 the foregoing proceedings was by me duly sworn to  
8 testify to the truth, the whole truth, and nothing but  
9 the truth;

10 That said proceedings were taken before me at  
11 the time and place therein set forth and were taken down  
12 by me stenographically and were transcribed through  
13 computerized transcription by me;

14 I further certify that I am neither counsel  
15 for, nor related to, any party to said proceedings, nor  
16 in any way interested in the outcome thereof.

17 IN WITNESS WHEREOF, I have hereunto subscribed  
18 my name.

19

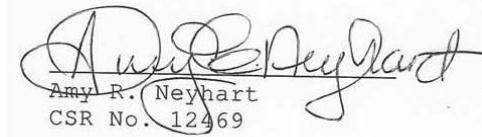
20 Dated: May 23, 2024

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24

  
Amy R. Neyhart  
CSR No. 12469

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